

EXHIBIT 2

**EXHIBIT 2: DANSKE BANK A/S LONDON BRANCH’S (“DANSKE”) RESPONSES AND OBJECTIONS
TO THE GOVERNMENT’S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Request No.	Request	Bates No. of Previously Produced Documents	Production Date(s)	Objections and Responses
1	Produce any and all documents concerning your interest in the DCSL resort, including, but not limited to, any documents in which you indicated your ownership of the DCSL resort (<u>e.g.</u> , any financial disclosure forms whether audited or unaudited), shareholder reports or tax returns); any documents concerning your payment of any taxes or other expenses for the loan associated with the DCSL resort; and any documents reflecting any losses claimed for the loan associated with the DCSL resort.	DANSKE_0010532- DANSKE_0015312 Motion for Summary Judgment Exhibits 37-39	October 2019 June 2020	Danske objects to this Request as overbroad, vague and ambiguous, unduly burdensome, unreasonable in terms of time period, and seeks information which is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objections, Danske refers the government to its previous production and based on its objections will not produce any of the other documents called for in this Request.
2	Produce any and all documents concerning the acquisition of your interest in the DCSL resort from Lehman and/or Lehman Bankruptcy estate, including, but not limited to, documents concerning (a) the date when you purchased the DCSL resort loan from Lehman and/or Lehman Bankruptcy estate; (b) the amount of consideration, if any, that you provided to purchase the DCSL resort loan from Lehman and/or the Lehman Bankruptcy estate; (c) the value attributed to the DCSL resort loan in your settlement with Lehman and/or the Lehman Bankruptcy estate during the Lehman	DANSKE_0012223 DANSKE_0013057 DANSKE_0012726 DANSKE_0014107 DANSKE_0015762 DANSKE_0015762 DANSKE_0015780 DANSKE_0015784 Motion for Summary Judgment Exhibits 37-39	October 2019 June 2020	Danske objects to this Request as overbroad, unduly burdensome and seeks publicly available documents. Without waiving its objections, Danske refers the government to its previous production and will produce the following additional document: a 2009 Jones Lang LaSalle valuation report regarding the Resort Property.

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	Bankruptcy; and (d) the transaction documents, under the Repo Agreement or otherwise, evidencing (i) the purchase price for the purchase of the DCSL resort loan and (ii) the terms of Lehman's repurchase of the DCSL resort loan.			
3	Produce any and all documents, including continuation statements, evidencing Danske's claimed "secured interests in shares" in (a): Baja Ventures 2006, LLC; (b) Diamante Properties, LLC; (c) CSL Properties 2006 LLC; and (d) KAJ Holdings, LLC.	<p>DANSKE_0013220 DANSKE_0015269 DANSKE_0013228 DANSKE_0011928 DANSKE_0015011 DANSKE_0015059 DANSKE_0014904 DANSKE_0014952 DANSKE_0013331 DANSKE_0014538 DANSKE_0014861 DANSKE_0014866 DANSKE_0015010 DANSKE_0015119 DANSKE_0015120 DANSKE_0015126 DANSKE_0015177</p> <p>Motion for Summary Judgment Exhibit 70</p>	<p>October 2019</p> <p>June 2020</p>	<p>Danske objects to this Request as overbroad, vague and ambiguous, unduly burdensome, unreasonable in terms of time period, and seeks information which is not relevant, nor reasonably calculated to lead to the discovery of admissible evidence.</p> <p>Without waiving its objections, Danske refers the government to its previous production and will produce the following additional documents: UCC financing statements, if any, that may be responsive to this Request.</p>
4	Produce all documents evidencing Danske's claimed "perfected senior secured interest"	<p>DANSKE_0015269 DANSKE_0013228</p>	October 2019	Danske objects to this Request as overbroad and unduly burdensome and may seek documents that are subject to attorney

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	in: (a) Diamante Cabo San Lucas, LLC; and (b) PF Ventures, LLC.	DANSKE_0010945 DANSKE_0012720 DANSKE_0015243 DANSKE_0015263 DANSKE_0014244 DANSKE_0012796 DANSKE_0010724 Motion for Summary Judgment Exhibits 6, 7, 70	June 2020	client privilege, work product protection, or other applicable privileges. Without waiving its objections, Danske refers the government to its previous production and will produce the following additional documents: UCC financing statements, if any, that may be responsive to this Request.
5	Produce all copies of Danske's Uniform Commercial Code ("UCC" filings for any claimed interest in: (a) the DCSL resort; (b) Baja Ventures 2006, LLC; (c) Diamante Properties, LLC; (d) CSL Properties 2006 LLC; (e) KAJ Holdings, LLC; (f) Diamante Cabo San Lucas, LLC; and (g) PF Ventures, LLC.	DANSKE_0013220 DANSKE_0015269 DANSKE_0013228 DANSKE_0011928 DANSKE_0015263 DANSKE_0012726 DANSKE_0010532 DANSKE_0012138 Motion for Summary Judgment Exhibits 12, 13, 14, 78	October 2019 June 2020	Danske objects to this Request as duplicative of Request No. 4. Without waiving its objections, Danske refers the government to its previous production and will produce the following additional documents: UCC financing statements, if any, that may be responsive to this Request.
6	Produce any and all documents or communications made at any time between you and any other person, including, but not limited to, Jowdy, concerning the purchase	DANSKE_0015742 DANSKE_0015762 DANSKE_0015780 DANSKE_0015784	October 2019	Danske objects to this Request as overbroad and unduly burdensome, seeks irrelevant information, and to the extent it seeks information subject to the attorney client privilege and work product protection or any other applicable privilege.

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	and acquisition of the DCSL resort loan from Lehman.			Based on its objections, Danske will not produce the documents called for in the Request.
7	Produce any and all appraisals or valuations of the DCSL resort loan, including, but not limited to, all appraisals or valuations conducted during the course of the Lehman Bankruptcy by CB Richard Ellis and Clayton IPS, and all documentation used to prepare such appraisals or valuations.			Danske objects to this Request as overbroad and unduly burdensome, vague and ambiguous and seeks documents that are not relevant nor likely to lead to relevant evidence. Without waiving its objections, Danske will produce the following document: a valuation completed by Jones Lang LaSalle during the Lehman bankruptcy process.
8	Produce any and all appraisals or valuations of the DCSL resort, including, but not limited to, all appraisals or valuations conducted during the course of the Lehman Bankruptcy by CB Richard Ellis and Clayton IPS, and all yearly appraisals or valuations conducted by Danske for the years 2009 to the present, inclusive, and all documentation used to prepare such appraisals or valuations.			Danske objects to this Request as overbroad and unduly burdensome, and seeks documents that are not relevant nor likely to lead to relevant evidence. Danske previously provided the government with copies of appraisals it had completed by Jones Lang LaSalle and Bruce Greenberg. Without waiving its objections, Danske refers the government to its previous production and will produce the following additional documents: a valuation completed by Jones Lang LaSalle during the Lehman bankruptcy process.
9	Produce all emails and correspondence between Danske and Lehman with regard to the valuation of the commercial loans under the MRA.	DANSKE_0015740 Motion for Summary Judgment Exhibits 38, 39	April 2020 June 2020	Danske objects to this Request as overly broad and unduly burdensome, vague and ambiguous, and seeks documents subject to the attorney client privilege, work product, or any other applicable privilege.

Request No.	Request	Bates No. of Previously Produced Documents	Production Date(s)	Objections and Responses
				Based on its objections, Danske will not produce the documents called for in the Request.
10	Produce unredacted, fully executed copies of the MRA and Repo Agreements between Danske and Lehman with all corresponding exhibits.	DANSKE_0015740	April 2020	Danske objects to this Request as over broad and unduly burdensome and seeks information that is not relevant. Without waiving its objections, Danske refers the government to its previous production and will produce any additional documents, if any, in Danske's possession.
11	Produce any and all documents evidencing the MRA or the amendments in which the Lehman loan to the DCSL resort is included.	DANSKE_0015740 DANSKE_0015981 Motion for Summary Judgment Exhibits 26, 28, 29	April 2020 June 2020	Danske objects to this Request as over broad and unduly burdensome and seeks information that is not relevant. Without waiving its objections, Danske refers the government to its previous productions and will produce any additional documents, if any, in Danske's possession.
12	Produce the assignment agreement from February 2009 between Danske and Lehman.	DANSKE_0012223	October 2019	Danske objects to this Request as it seeks material that does not exist or otherwise assumes facts that are incorrect as the assignment agreement is dated as of January 2009. Without waiving its objections, Danske refers the government to its previous productions and based on its objections, will not produce any of the other documents called for in the Request.
13	Produce any and all Repo confirmation statements between Danske and Lehman.	DANSKE_0015981	June 2020	Danske objects to this Request as overly broad and unduly burdensome, and vague and ambiguous.

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				Without waiving its objections, Danske refers the government to its previous production and based on its objections, will not produce any of the other documents called for in the Request.
14	Produce any and all documents that supported Danske's proof of claim filed in the Lehman Bankruptcy.	DANSKE_0015981 Motion for Summary Judgment Exhibit 96	June 2020	Danske objects to this Request as overly broad and unduly burdensome, and seeks production of documents that may be subject to the attorney client privilege, work product, or any other applicable privilege. Without waiving its objections, Danske refers the government to its previous productions and based on its objections, will not produce any of the other documents called for in the Request.
15	Produce any and all documents that established Danske's reduced proof of claim in the amount of \$580 million in the Lehman Bankruptcy proceedings.	Motion for Summary Judgment Exhibits 37-39	June 2020	Danske objects to this Request as overly broad and unduly burdensome, vague and ambiguous, and seeks production of documents subject to the attorney client privilege, work product, or any other applicable privilege. Without waiving its objections, Danske refers the government to its previous productions and based on its objections, will not produce any of the other documents called for in the Request.
16	Produce any and all documents that established the consideration to transfer Danske's \$580 million claim in the Lehman Bankruptcy to Goldman Sachs.			Danske objects to this Request as overly broad and unduly burdensome, vague and ambiguous, seeks documents that are of no relevance, and seeks production of documents subject to the attorney client privilege, work product, or any other applicable privilege. Based on its objections, Danske will not produce the documents called for in the Request.

Request No.	Request	Bates No. of Previously Produced Documents	Production Date(s)	Objections and Responses
17	Produce (a) any and all servicing agreements with Trimont Real Estate Advisors, Inc., Michael Devlin, and any other third-party utilized by Danske or the Borrower to provide services regarding the DCSL resort loan; and (b) any and all correspondence, reports and documents prepared according to such servicing agreements, including, but not limited to, those identified in Document Requests 18, 19, 20, and 27.	DB000001- DB00774	June 2015	<p>Danske objects to this Request as it seeks documents that are not in Danske's custody, control, or possession, is overly broad and unduly burdensome, seeks production of documents subject to the attorney client privilege, work product, or any other applicable privilege, and seeks documents of no relevance.</p> <p>Without waiving its objections, Danske refers the government to its previous production and will produce the following additional document: the servicing agreement with Trimont.</p>
18	Provide all required construction documents identified in the Loan Agreements under Article VIII, Section 8.1, Replacement Facility C - Required Construction Documents, and under Article IX, Section 9.2, Construction Budget-Replacement Facility C, for each disbursement and/or loan advance from Facility C.			<p>Danske objects to this Request as overly broad and unduly burdensome and seeks documents of no relevance.</p> <p>Based on its objections, Danske will not produce the documents called for in the Request.</p>
19	Provide all reports furnished by the Borrower to Danske pursuant to the Loan Agreements, Section 13.5, Reporting Covenants, including, but not limited to: Section 13.5(a), Weekly Reports; Section 13.5(b), Monthly Reports; Section 13.5(c), Quarterly Reports; and Section 13.5(d), Annual Reports.			<p>Danske objects to Request No. 19 as overly broad and unduly burdensome, and seeks documents of no relevance.</p> <p>Based on its objections, Danske will not produce the documents called for in the Request.</p>

Request No.	Request	Bates No. of Previously Produced Documents	Production Date(s)	Objections and Responses
20	Produce any and all status reports created, authored, and/or produced by Michael Devlin.	DB000001- DB00774	June 2015	Danske objects to Request No. 20 as overly broad and unduly burdensome, and seeks documents of no relevance. Without waiving its objections, Danske refers the government to its previous production and based on its objections, Danske will not produce the documents called for in the Request.
21	Produce any and all documents showing the amount and calculation of Danske's claimed default interest.			Danske objects to this Request as overly broad and unduly burdensome, and seeks documents that may be subject to the attorney client privilege, work product, or any other applicable privilege. Without waiving its objections, Danske refers the government to its previous production and based on its objections, will not produce any of the other documents called for in the Request.
22	Produce any and all documents showing the calculation and valuation for Danske's claimed profit participation fee under the Loan Agreements.	DANSKE_0015590	March 2020	Danske objects to this Request as overly broad and unduly burdensome, and seeks documents that may be subject to the attorney client privilege, work product, or any other applicable privilege. Without waiving its objections, Danske refers the government to its previous production and based on its objections, will not produce any of the other documents called for in the Request.
23	Provide a complete set of statements for each sub-account set up by Danske related to each loan facility, including, but not limited to, the following accounts:	DANSKE_0015957 DANSKE_0015958 DANSKE_0015972 DANSKE_0015973 DANSKE_0015974 DANSKE_0015975	June 2020	Danske objects to this Request as overly broad and unduly burdensome. Without waiving its objections, Danske refers the government to its previous production and will produce the following additional documents: statements for the Interest Reserve, Ocean Club

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		DANSKE_0015976 DANSKE_0015977 DANSKE_0015978		Reserve, Commission Reserve, and Ocean Club Reserve to the extent such statements exist. Danske will not produce additional documents responsive to this Request.

Bank Name	Account Number	Name on Account	Account Description
Danske Bank A/S	22028839	Diamante Cabo San Lucas S. de R.L. de C.V.	Interest Reserve
Danske Bank A/S	36030321	Diamante Cabo San Lucas S. de R.L. de C.V.	Tax Reserve
Danske Bank A/S	36030429	Diamante Cabo San Lucas S. de R.L. de C.V.	Ocean Club Reserve
Danske Bank A/S	36030453	Diamante Cabo San Lucas S. de R.L. de C.V.	Commission Reserve
Danske Bank A/S	36990540	Diamante Cabo San Lucas S. de R.L. de C.V.	Danske Bank London BranchDiscount-Cabo
Danske Bank A/S	36991065	Diamante Cabo San Lucas S. de R.L. de C.V.	Danske Bank London BranchProfessional Fees

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24	Provide support for the \$900,000 transfer from Facility C on October 10, 2018.	DANSKE_0015549	March 2020	Danske refers the government to its previous production and will produce any wire transfer confirmation, if any, that is responsive to this Request.
25	Provide wire transfer documentation to support the transfers from Trimont to the Borrower for the 45 loan advance wire transfers, totaling \$53,476,556, from Facility C to Trimont Real Estate Advisors			Danske objects to this Request as overbroad, unduly burdensome and irrelevant. Based on its objections, Danske will not produce documents responsive to this Request.

Request No.	Request	Bates Nos.	Production Date(s)	Objections and Responses
	Inc. (Wells Fargo Bank Account — Account Number 2000025192043).			
26	Provide bank statements for other bank accounts identified that funds from Facility A, B and C may have been indirectly transferred to, including, but not limited to, the following accounts:			Danske objects to this Request as over broad, unduly burdensome, and irrelevant and seeks documents not Danske's control, custody or possession. Based on its objections, Danske will not produce the documents called for in the Request.

Bank Name	Account Number	Name on Account	Account Description
Borrower's and Borrower	Affiliates' Bank Accounts Identified in Loan Documents:		
Bank of New York	6550253668	Diamante CSL LLC	Unknown
Banco Mercantil del Norte	540653166	Diamante Cabo San Lucas S. de R.L. de C.V.	Checking - Development Expenses
TD Bank	4337813269	Diamante CSL LLC	Sales Revenue
TD Bank	4342295808	Diamante Management Services, Inc.	Operations / Private Construction
Wells Fargo Bank	2000030104660	Diamante Cabo San Lucas S. de R.L. de C.V.	Checking Account & Collateral Account
Wells Fargo Bank	2000058292732	Diamante Cabo San Lucas S. de R.L. de C.V.	Sales Account & Collateral Account
Wells Fargo Bank	2000046014993	Diamante Cabo San Lucas S. de R.L. de C.V.	Operating Account & Collateral Account

Wells Fargo Bank	7014523448	Diamante Cabo San Lucas S. de R.L. de C.V.	Holding Account
Wells Fargo Bank	8405659858	Diamante Cabo San Lucas S. de R.L. de C.V.	Money Market Account
Wells Fargo Bank	515552179	Diamante Cabo San Lucas S. de R.L. de C.V.	Holding Account
Wells Fargo Bank	7014523331	Diamante Cabo San Lucas S. de R.L. de C.V.	Closing Costs Account
Wells Fargo Bank	70452291	Diamante Club LLC	Checking Account
Banco Mercantil del Norte	626436124	Diamante Cabo San Lucas S. de R.L. de C.V.	Operations Revenue
Banco Mercantil del Norte	626436160	Diamante Cabo San Lucas S. de R.L. de C.V.	Operations Revenue
Banco Mercantil del Norte	647958993	Diamante Cabo San Lucas S. de R.L. de C.V.	Sales Revenue
Banco Mercantil del Norte	885768006	Diamante Cabo San Lucas S. de R.L. de C.V.	Private Construction Expenses / Deposits
Banco Mercantil del Norte	811253725	Diamante Cabo San Lucas S. de R.L. de C.V.	TRC Expenses
Banco Mercantil del Norte	537788291	Diamante Cabo San Lucas S. de R.L. de C.V.	Checking - Development Expenses
Banco Mercantil del Norte	629300744	Diamante Cabo San Lucas S. de R.L. de C.V.	Operations Expenses
Banco Mercantil del Norte	626436058	Diamante Cabo San Lucas S. de R.L. de C.V.	Operations Revenue
Banco Mercantil del Norte	813490962	Diamante Cabo San Lucas S. de R.L. de C.V.	TRC Expenses
Banco Mercantil del Norte	893014435	Diamante Cabo San Lucas S. de R.L. de C.V.	Private Construction Expenses/ Deposits

Banco Mercantil del Norte	646208440	Diamante Cabo San Lucas S. de R.L. de C.V.	Closing Cost/GV33
Banco Mercantil del Norte	640368650	Diamante Cabo San Lucas S. de R.L. de C.V.	Closing Cost/GV33
Santander Bank	82-500603302	Diamante Cabo San Lucas S. de R.L. de C.V.	Operations Revenue
Banco Mercantil del Norte	404167402	DCSL Residential Services S. de R.L. de C.V.	Residential Services
Banco Mercantil del Norte	417271215	DCSL Residential Services S. de R.L. de C.V.	Residential Services
Banco Mercantil del Norte	404167224	DCSL Residential Services S. de R.L. de C.V.	Residential Services
Banco Mercantil del Norte	420856633	DCSL Residential Services S. de R.L. de C.V.	Residential Services
Banco Mercantil del Norte	218796607	Diamante Development S. de R.L.	Construction Payroll
Banco Mercantil del Norte	219135744	Diamante Development S. de R.L.	Construction Payroll
Banco Mercantil del Norte	807291878	Diamante Life S. de R.L. de C.V.	Dlife Exp-Dep
Banco Mercantil del Norte	540653184	Diamante Life S. de R.L. de C.V.	Dlife Exp-Dep
Banco Mercantil del Norte	644363868	Prestadora de Servicios S. de R.L. de C.V.	PS Bank Account
Banco Mercantil del Norte	212349937	Prestadora de Servicios Diamante S. de R.L. de C.V.	Payroll Expenses
Banco Mercantil del Norte	646208459	Prestadora de Servicios Diamante S. de R.L. de C.V.	Payroll Expenses
Banco Mercantil del Norte	241523315	Prestadora de Servicios Turistico y de Golf S. de	Payroll Expenses

Banco Mercantil del Norte	242265256	Prestadora de Servicios Turistico y de Golf S. de	Payroll Expenses
Unknown	8832	Pacifico Associates SA	USD Bank Account

Bank Name	Number	Account Name on Account	Account Description
HOA Accounts Identified in Loan Documents:			
	489827440	Regimen Secundario de Propiedad en Condominium Casitas Fase 1	HOA Account
	489827507	Regimen Secundario de Propiedad en Condominium Casitas Fase 2	HOA Account
	485615694	Diamante SCL Master HOA AC	HOA Account
	485615649	Diamante SCL Master HOA AC	HOA Account
	485615779	Regimen de Propiedad en Condominio Beach Estates	HOA Account
	488710536	Regimen de Propiedad en Condominio Beach Estates	HOA Account
	485615818	Sub-Regimen de Propiedad en Condominio 1 Golf Villas del RE	HOA Account
	489827413	Sub-Regimen de Propiedad en Condominio 1 Golf Villas del RE	HOA Account
	485615676	Sub-Regimen de Propiedad en Condominio 2 Sunset Hill	HOA Account
	485615621	Sub-Regimen de Propiedad en Condominio 2 Sunset Hill	HOA Account
	485615742	Sub-Regimen de Propiedad en Condominio Denominado DRC-Lote A	HOA Account
	488710518	Sub-Regimen de Propiedad en Condominio Denominado DRC-Lote A	HOA Account

Unrelated Party Bank Accounts Identified in Loan Documents:			
BBVA Bancomer	8000541817100	Stewart Title Guaranty de Mexico S.A.	Unknown
Banco Nacional de Mexico	0660 / 9582454	Fidelity National Title de Mexico S.A. Unknown	
Keybank	1001516552	Baker & Hostetler LLP	Unknown
PNC Bank	5501298602	Venable LLP	Escrow Account
HSBC Mexico	40021041070029475	Jose Alberto Castro Salazar	Unknown
JP Morgan Chase	447449955	FNF Title International Holding Co.	Unknown
Unknown	03706797575	Daniel Urrea Gonzalez Paul or Narda Rodriguez	Unknown
Compass Bank	2511134873	Bruce D Greenberg, Inc.	Unknown

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27	Provide all Trimont summary statements, account statements, and invoices identified as 'Missing' below:	DANSKE_0015502 DANSKE_0015670 DANSKE_0015515 DANSKE_0015604 DANSKE_0015673	March 2020	Danske objects to Request No. 27 on the ground that it is over broad, unduly burdensome, and irrelevant and seeks documents not in Danske's custody, control or possession. Without waiving its objections, Danske refers the government to its previous production and will produce the following additional documents: Danske will produce statements and invoices responsive to this request to the extent that Danske has possession of such documents.

Month/Year	Facility A		Facility B		Facility C		Trimont Summary Statement
	Trimont Statements	Trimont Invoices	Trimont Statements	Trimont Invoices	Trimont Statements	Trimont Invoices	
Apr-06 to Aug-08	Missing	Missing					
Sep-08 to Nov-08		Missing					
Dec-08 to Feb-09		Missing					
Mar-09 to May-10		Missing		Missing			
Jun-10 to Aug-10	Missing	Missing	Missing	Missing			
Sep-10 to Nov-10		Missing	Missing	Missing			
Dec-10 to Nov-11		Missing		Missing			
Dec-11 to Feb-12	Missing		Missing				
Jan-12	Missing		Missing				
Mar-12 to Jun-12	Missing	Missing	Missing	Missing			
Jul-12 to Dec-12	Missing		Missing				
Jan-13 to Mar-13	Missing		Missing				
Apr-13 to Dec-13	Missing		Missing		Missing		Missing
Jan-14 to Mar-14	Missing	Missing	Missing	Missing	Missing	Missing	Missing
Apr-14	Missing		Missing		Missing		Missing
May-14 to Dec-14	Missing		Missing		Missing		
Jan-15 to Mar-15	Missing		Missing	Missing	Missing		
Apr-15 to Dec-15	Missing	Missing	Missing	Missing	Missing	Missing	
Jan-16 to Sep-16	Missing		Missing		Missing		
Oct-16 to Dec-16	Missing	Missing	Missing	Missing	Missing	Missing	

Request No.	Request	Bates No(s).	Production Date(s)	Objections and Responses
28	For each disbursement and/or loan advance from Facilities A, B, C, and D, including, but not limited to, the transactions in the table below, provide complete draw request packages, containing all documents identified in Section 11.1, Documents to be Furnished for Each Disbursement, of the loan agreements as a condition precedent to the disbursement of funds from the loan facilities.			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.

Facility	Account Number	Statement Number	Entry Date	Value Date	Transaction Description	Transaction Value
A	90003664	1	11/19/08	11/19/08	OUTWARD 4022-83245122794	\$20,015
A	90003664	2	01/14/09	01/14/09	OUTWARD 4022-90146641714	1,600,015

Facility	Account Number	Statement Number	Entry Date	Value Date	Transaction Description	Transaction Value
A	90003664	3	05/19/09	05/19/09	OUTWARD 4022-91391762512	1,032,397
A	90003664	8	04/29/13	04/29/13	OUTWARD 4022-31194190714	428,375
B	90003761	2	06/15/09	06/15/09	OUTWARD 4022-91662507620	1,010,636
B	90003761	3	07/06/09	07/06/09	OUTWARD 4022-91873141644	1,345,218
B	90003761	3	07/31/09	07/31/09	OUTWARD 4022-92123816270	1,733,382
B	90003761	3	09/01/09	09/01/09	OUTWARD 4022-92444629416	600,000
B	90003761	3	09/04/09	09/04/09	OUTWARD 4022-92474750838	1,153,649
B	90003761	3	09/23/09	09/23/09	OUTWARD 4022-92665184262	600,000
B	90003761	4	10/01/09	10/01/09	OUTWARD 4022-92745501218	1,678,172
B	90003761	4	10/29/09	10/29/09	OUTWARD 4022-93026251756	1,477,890
B	90003761	4	11/23/09	11/23/09	OUTWARD 4022-93276906316	700,000
B	90003761	5	12/08/09	12/08/09	OUTWARD 4022-93427409284	909,255
B	90003761	5	12/18/09	12/18/09	OUTWARD 4022-93517677256	250,387
B	90003761	5	12/18/09	12/18/09	OUTWARD 4022-93517677258	68,484
B	90003761	6	01/13/10	01/13/10	OUTWARD 4022-00138377404	200,000
B	90003761	6	01/29/10	01/29/10	OUTWARD 4022-00298855524	1,419,343
B	90003761	6	01/29/10	01/29/10	OUTWARD 4022-00298845196	300,000
B	90003761	7	02/25/10	02/25/10	OUTWARD 4022-00569578900	946,201
B	90003761	8	03/26/10	03/26/10	OUTWARD 4022-00850444678	756,856
B	90003761	9	05/05/10	05/05/10	OUTWARD 4022-01251555172	349,710
B	90003761	16	03/01/13	03/01/13	OUTWARD 4022-30602283364	390,011
B	90003761	17	04/12/13	04/12/13	OUTWARD 4022-31023628668	306,271
C	36030240	1	05/24/13	05/24/13	OUTWARD 4022-31444995958	582,728
C	36030240	1	06/24/13	06/24/13	OUTWARD 4022-31756015522	683,300

C	36030240	2	08/29/13	08/29/13	OUTWARD 4022-32418274570	37,691
C	36030240	5	05/06/14	05/06/14	OUTWARD 4022-41266802658	2,000,000
C	36030240	5	06/26/14	06/26/14	OUTWARD 3826-41778554262	2,000,000
C	36030240	6	07/23/14	07/23/14	OUTWARD 4022-42049409644	2,000,000
C	36030240	6	08/21/14	08/21/14	OUTWARD 4022-42330354778	2,000,000
C	36030240	7	10/07/14	10/07/14	OUTWARD 4022-42802014522	2,000,000
C	36030240	7	12/30/14	12/30/14	OUTWARD 4022-43644982596	1,587,637
C	36030240	8	01/13/15	01/13/15	OUTWARD 4022-50135372462	910,934
C	36030240	8	02/25/15	02/25/15	OUTWARD 4022-50556843448	905,834
C	36030240	8	03/04/15	03/04/15	OUTWARD 4022-50637156334	2,000,000
C	36030240	9	04/02/15	04/02/15	OUTWARD 4022-50928178314	1,750,000
C	36030240	10	07/03/15	07/03/15	OUTWARD 4022-51841485826	1,500,000
C	36030240	10	08/04/15	08/04/15	OUTWARD 4022-52162524448	1,250,000
C	36030240	10	09/15/15	09/15/15	OUTWARD 4022-52583918698	1,750,000
C	36030240	11	10/02/15	10/02/15	OUTWARD 4022-52754633438	1,750,000
C	36030240	11	11/06/15	11/06/15	OUTWARD 4022-53105862840	1,394,488
C	36030240	11	12/10/15	12/10/15	OUTWARD 3826-53447096398	1,250,000
C	36030240	12	01/06/16	01/06/16	OUTWARD 4022-60068010908	1,402,000
C	36030240	14	07/26/16	07/26/16	OUTWARD 4022-62085531840	1,500,000

Facility	Account Number	Statement Number	Entry Date	Value Date	Transaction Description	Transaction Value
C	36030240	15	10/13/16	10/13/16	OUTWARD 4022-62878535812	1,500,000
C	36030240	15	12/28/16	12/28/16	OUTWARD 4022-63631625114	1,500,000
C	36030240	16	03/17/17	03/17/17	OUTWARD 4022-70764778798	1,431,894
C	36030240	17	05/12/17	05/12/17	OUTWARD 4022-71327433154	1,450,000
C	36030240	21	02/12/18	02/12/18	OUTWARD 4022-80431628978	950,000
C	36030240	21	02/23/18	02/23/18	OUTWARD 4022-80542422980	2,000,000
C	36030240	21	03/27/18	03/27/18	OUTWARD 4022-80864099028	1,750,000
C	36030240	22	04/12/18	04/12/18	OUTWARD 4022-81024789440	2,500,000
C	36030240	22	05/04/18	05/04/18	OUTWARD 4022-81246121754	1,750,000
C	36030240	22	05/30/18	05/30/18	OUTWARD 4022-81507516988	1,800,000
C	36030240	22	06/22/18	06/22/18	OUTWARD 4022-81738787708	2,100,000
C	36030240	23	07/31/18	07/31/18	OUTWARD 4022-82120916452	800,000
C	36030240	23	08/24/18	08/24/18	OUTWARD 4022-82362133682	550,000
C	36030240	23	09/06/18	09/06/18	OUTWARD 4022-82492825476	1,200,000
C	36030240	23	09/13/18	09/13/18	OUTWARD 4022-82563109794	1,850,000
C	36030240	23	09/28/18	09/28/18	OUTWARD 4022-82714119646	1,905,000
C	36030240	24	10/10/18	10/10/18	OUTWARD 4022-82834633272	900,000
C	36030240	24	11/16/18	11/16/18	OUTWARD 4022-83206788520	1,941,098
C	36030240	24	11/30/18	11/30/18	OUTWARD 4022-83347713714	2,000,000
C	36030240	24	12/19/18	12/19/18	OUTWARD 4022-83538891662	2,250,000
C	36030240	25	01/25/19	01/25/19	OUTWARD 4022-90250851766	1,300,000
C	36030240	25	02/22/19	02/22/19	OUTWARD 3826-90532477592	475,000
C	36030240	25	03/14/19	03/14/19	OUTWARD 4022-90733552344	650,000
C	36030240	26	04/17/19	04/17/19	OUTWARD 4022-91075749852	1,500,000
C	36030240	26	05/10/19	05/10/19	OUTWARD 3826-91307068190	1,500,000
C	36030240	26	05/24/19	05/24/19	OUTWARD 4022-91448050600	1,800,000
C	36030240	27	07/03/19	07/03/19	OUTWARD 4022-91840475862	550,000
C	36030240	27	07/12/19	07/12/19	OUTWARD 4022-91930981954	800,000
C	36030240	28	11/05/19	11/05/19	OUTWARD 4022-93098099318	1,000,000
					Total Outward Transfers:	<u>\$91,233,871</u>

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
29	Produce any and all documentation identifying the procedures, policies, and practices of Danske, and its officers, employees or owners, for receiving, soliciting, preparing, reviewing, approving or denying loans or client relationships.			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.
30	Produce any and all documentation identifying the procedures, policies, and practices of Danske, and its officers, employees or owners, for inquiring into an investment's connection to actual or potential criminal activity and/or misconduct, and/or actual or potential mismanagement.			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.
31	Produce any and all notes, correspondence, and documentation pertaining to Danske's inquiry into the involvement or connection to actual or potential criminal activity and/or misconduct, and/or actual or potential mismanagement by the Defendants, Jowdy, and/or the DCSL resort.			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.
32	Produce any and all notes, correspondence, and documentation pertaining to media inquiries to			Danske objects to this Request as over broad, unduly burdensome, and irrelevant.

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
	Danske and/or its employees about the involvement or connection to actual or potential criminal activity and/or misconduct, and/or actual or potential mismanagement by the Defendants, Jowdy, and/or the DCSL resort, including support for Peter Hughes of Danske's statement to Fortune magazine in 2012 that "If there had been mismanagement, I think it would have turned up in the due diligence we've conducted on the project over the past three years . . . we found no evidence that Jowdy was stealing money, and we're satisfied with the job he's doing."			Based on its objections, Danske will not produce the documents called for in the Request.
33	Produce any and all documents or information available to or within the knowledge of Danske and and/or any such company's officers, employees, owners, concerning the conduct or assets of Jowdy, his associates, relatives, representatives, and related entities.			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.
34	Produce any and all documents pertaining to any agreements and guarantees between Danske and any and all Jowdy related entities, including, but not limited to, Legacy	DANSKE_0012837 DANSKE_0014820 DANSKE_0013266 DANSKE_0011598 DANSKE_0011624	October 2019	Danske objects to this Request as over broad, unduly burdensome, and irrelevant.

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
	Cabo, LLC, Legacy Properties, LLC, KAJ Holdings LLC and Silverpeak.	DANSKE_0013728 DANSKE_0013769 DANSKE_0014736 DANSKE_0013257 DANSKE_0013301 DANSKE_0011572 DANSKE_0011585 DANSKE_0011598 DANSKE_0011611 DANSKE_0011637 DANSKE_0011665 DANSKE_0011741 DANSKE_0011768 DANSKE_0011786 DANSKE_0012818 DANSKE_0013616 DANSKE_0013728 DANSKE_0012931 DANSKE_0012784 DANSKE_0012807		Without waiving its objections, Danske refers the government to its previous production and based on its objections will not produce any of the other documents called for in the Request.
35	Produce the Bylaws and Operating Agreement for DCSL Mexico and any documents confirming the change of trustee in or about 2014, all translated into English.			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.
36	Produce any and all notices of default of the DCSL resort loan, and any and all documentation that notices of default were sent to the	DANSKE_0015713	April 2020	Danske objects to Request No. 36 that it is over broad, unduly burdensome, and irrelevant.

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
	Borrower and/or Trustee of the Mexican trust.			Without waiving its objections, Danske refers the government to its previous production and based on its objections will not produce any of the other documents called for in the Request.
37	Produce the most recent financial information for DCSL Mexico, including financial statements and tax returns.			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.
38	Produce the fully executed 2009 Loan Agreement between Danske and DCSL Mexico.	DANSKE_0013865	10/19/2019	Danske objects to this Request as vague and ambiguous. Without waiving its objections, Danske refers the government to its previous production and based on its objections will not produce any of the other documents called for in the Request.
39	Produce the executed copies of any termination agreements between Danske and DCSL Mexico.			Danske objects to this Request as vague and ambiguous. Danske is not aware of any termination agreements between Danske and DCSL Mexico.
40	Produce any and all documentation regarding the due diligence performed by Danske regarding the (a) acquisition of the DCSL resort loan; and (b) entering into loan agreements and/or modifications with the Borrower, including deliverables, obligations, and the satisfaction of conditions by DCSL Mexico as required under all extensions, modifications, facility			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
	increases, advances and amendments to the Loan Documents.			
41	Identify any and all Danske and/or Lehman employees, past or present, who currently hold or have held an interest, directly or indirectly, in the DCSL resort.			Danske objects to this Request as over broad, unduly burdensome, irrelevant, vague and ambiguous. Based on its objections, Danske will not produce the documents called for in the Request.
42	Produce any and all documentation concerning any and all direct or indirect interests in the DCSL resort, current or prior, held by past or present employee(s) of Danske and/or Lehman.			Danske objects to this Request as over broad, unduly burdensome, irrelevant, vague and ambiguous, and duplicative of Request No. 41. Based on its objections, Danske will not produce the documents called for in the Request.
43	Produce any and all documents and correspondence pertaining to Danske's: (a) knowledge of accusations by any individuals or entities concerning theft or misconduct by the Defendants, Jowdy, and/or the DCSL resort, including, but not limited to, accusations contained in civil complaints filed by Joe Juneau, Owen Nolan, Philip Kenner, Ethan Moreau, Sergei Gonchar, Glenn Murray, Little Isle IV, and Josef			Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Based on its objections, Danske will not produce the documents called for in the Request.

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
	Stumpel; and (b) response(s) to such accusations.			
44	Identify: (a) any and all Danske employees or contractors who visited the DCSL resort; (b) the date(s) of any visit; (c) the purpose of the visit(s); (d) the lodging used by the employee(s)/contractor(s) during the visit(s); (d) any gifts or benefits conferred, directly or indirectly, on a Danske employee/contractor by Jowdy and/or any employee or contractor of the DCSL resort; and (e) any gifts or benefits conferred, directly or indirectly, on Jowdy and/or any employee or contractor of the DCSL resort by a Danske employee/contractor.			<p>Danske objects to this Request as over broad, unduly burdensome, irrelevant, and vague and ambiguous.</p> <p>Based on its objections, Danske will not produce the documents called for in the Request.</p>
45	Produce any and all correspondence between Danske and the Defendants.			<p>Danske objects to this Request as over broad, unduly burdensome, and irrelevant.</p> <p>Based on its objections, Danske will not produce the documents called for in the Request.</p>
46	Produce any and all documentation, or correspondence between Danske and the Borrower and/or Jowdy, regarding the Borrower's ability or			<p>Danske objects to this Request as over broad, unduly burdensome, irrelevant, and duplicative of Request No. 36.</p> <p>Based on its objections, Danske will not produce the documents called for in the Request.</p>

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
	inability to meet its loan obligations to Danske and/or Lehman.			
47	Produce any and all documentation and agreements regarding, and correspondence between, Danske and Jowdy, the Borrower, and/or the Trustee, regarding the potential or actual forfeiture of the DCSL resort.			<p>Danske objects to this Request as over broad, unduly burdensome, irrelevant, and purportedly seeks documents which potentially are covered by the attorney-client privilege, attorney work product privilege, and/or any other applicable privilege.</p> <p>Based on its objections, Danske will not produce the documents called for in the Request.</p>
48	Produce any and all documentation and agreements (whether in draft or executed), and correspondence between, Danske and Jowdy and/or the Borrower, regarding: (a) Jowdy's future ownership interest(s), direct or indirect, in the DCSL resort and/or Equity Interests; (b) any Lehman or Danske employee's future ownership interest(s), direct or indirect, in the DCSL resort and/or Equity Interests; (c) potential purchasers of the DCSL resort and/or the DCSL resort loan; (d) foreclosure or forfeiture on the DCSL resort loan in Mexico or in the United States; (e) bankruptcy or insolvency proceedings concerning the DCSL resort or the Equity Interests in either Mexico or the United States; and (f) Jowdy's direct or indirect management of the DCSL			<p>Danske objects to this Request as over broad, unduly burdensome, irrelevant, and purportedly seeks documents which are potentially covered by the attorney-client privilege, attorney work product privilege, and/or any other applicable privilege.</p> <p>Based on its objections, Danske will not produce the documents called for in the Request.</p>

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
	resort during and/or after the instant criminal case.			
49	Produce any and all documentation and correspondence concerning agreements between Danske and the Borrower and/or Jowdy that confer a, direct or indirect, personal or financial benefit on Jowdy.			<p>Danske objects to this Request as incorrectly assuming that such documents exist, as over broad and unduly burdensome, and vague and ambiguous.</p> <p>Danske previously provided the government with the commission agreement between Danske and Jowdy. Without waiving its objections, Danske refers the government to its previous production and based on its objections, will not produce any of the other documents called for in the Request.</p>
50	Produce any and all documentation regarding the miscellaneous fees claimed in your Verified Petition.			<p>Danske objects to this Request as over broad, unduly burdensome, irrelevant, and purportedly seeks documents which are potentially covered by the attorney-client privilege, attorney work product privilege, and/or any other applicable privilege.</p> <p>Without waiving its objections, Danske refers the government to its previous production of statements and loan agreements (<i>see</i> Response to Request Nos. 1, 27, and 54) and based on its objections will not produce any of the other documents called for in the Request.</p>
51	Produce English translations for the following documents:	DANSKE_0012726 DANSKE_0014107 DANSKE_0012138 DANSKE_0010532	October 2019	<p>Danske objects to this Request as over broad, unduly burdensome, irrelevant, and purportedly seeks documents which are potentially covered by the attorney-client privilege, attorney work product privilege, and/or any other applicable privilege.</p> <p>Without waiving its objections, Danske refers the government to its previous production and based on its objections will not produce any of the other documents called for in the Request.</p>

Document Name	Bates Number
March 18, 2009 Notice of Assignment of Bank Accounts in Favor of Trustee (Mexican Law)	DANSKE_0014278 to DANSKE_0014281
March 19, 2009 Notice of Assignment of (Performance) Bond in Favor of Trustee (Mexican Law)	DANSKE_0014282 to DANSKE_0014283
March 18, 2009 Notice of Assignment of (Construction and Service) Agreements in Favor of Trustee (Mexican Law)	DANSKE_0014284 to DANSKE_0014293
March 18, 2009 Notice of Assignment of Bank Accounts in Favor of Trustee (Mexican Law)	DANSKE_0013253 to DANSKE_0013256
March 18, 2009 Notice of Assignment of (Construction and Service) Agreements in Favor of Trustee (Mexican Law)	DANSKE_0013285 to DANSKE_0013294
July 30, 2013 Acta Aclaratoria con sellos E.P. 92,046	DANSKE_0010914 to DANSKE_0010933
April 26, 2013 Segundo Convenio Modificatorio Con Sellos E.P. 91, 326	DANSKE_0010958 to DANSKE_0010990
April 26, 2013 Pledgor in Possession Pledge (Mexico Law)	DANSKE_0012170 to DANSKE_0012201
March 2013 Environmental Report	DANSKE_0011971 to DANSKE_0012010
Annex to Acknowledgement of Trustee (Mexican Law)	DANSKE_0013069 to DANSKE_0013083
Spanish Language Document	DANSKE_0012202 to DANSKE_0012215
Spanish Language Document	DANSKE_0012967 to DANSKE_0012986
Spanish Language Document	DANSKE_0012992 to DANSKE_0013051
Spanish Language Document	DANSKE_0013233 to DANSKE_0013238
Spanish Language Document	DANSKE_0013264 to DANSKE_0013265
Spanish Language Document	DANSKE_0014774 to DANSKE_0014775

Document Name	Bates Number
Spanish Language Document	DANSKE_0014776 to DANSKE_0014777
Spanish Language Document	DANSKE_0014778 to DANSKE_0014779
Spanish Language Document	DANSKE_0014788 to DANSKE_0014802
Spanish Language Document	DANSKE_0014803 to DANSKE_0014806
Spanish Language Document (possibly the Operating Agreement for DCSL Mexico)	DANSKE_0014315 to DANSKE_0014324
Bylaws for DCSL Mexico	DANSKE_0014295 to DANSKE_0014312

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
52	Produce any and all documentation and correspondence related to insurance coverage or attempted insurance coverage of the DCSL resort or DCSL resort loan, of which Danske is a policy holder or beneficiary, or otherwise has an interest therefrom.	DANSKE_0015011 DANSKE_0015059 DANSKE_0014904 DANSKE_0014952	October 2019	Danske objects to this Request as over broad, unduly burdensome, and irrelevant. Without waiving its objections, Danske refers the government to its previous production and based on its objections will not produce any of the other documents called for in the Request.
53	Provide the historical LIBOR interest rates determined for each Facility over the life of that Facility Loan.			Danske objects to this Request as irrelevant, and seeks documents which the government can obtain publicly regarding the historical LIBOR interest rate.

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
				Without waiving its objections, Danske will produce the following document: Danske will produce a spreadsheet in which quarterly LIBOR information is maintained from 2017 through the present.
54	Provide a full accounting of all monies due, including advances of credit, payments, and charges from the acquisition of the underlying loans under the Loan Agreements to date that were used to calculate the amount Danske is owed as indicated in its Verified Petition.	DANSKE_0015936 DANSKE_0015926 DANSKE_0015902 DANSKE_0015894 DANSKE_0015942 DANSKE_0015946 DANSKE_0015923 DANSKE_0015908 DANSKE_0015918 DANSKE_0015921 DANSKE_0015891 DANSKE_0015937 DANSKE_0015898 DANSKE_0015930 DANSKE_0015912 DANSKE_0015897 DANSKE_0015956 DANSKE_0015945 DANSKE_0015934 DANSKE_0015919 DANSKE_0015954 DANSKE_0015899 DANSKE_0015900 DANSKE_0015944 DANSKE_0015928 DANSKE_0015895 DANSKE_0015887	October 2019	Danske objects to this Request as overly broad, unduly burdensome, and irrelevant. Without waiving its objections, Danske refers the government to its previous production and will produce the following additional documents: Danske will produce additional wire transfer confirmations to the extent that such documents are within its custody and control.

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
		DANSKE_0015888 DANSKE_0015913 DANSKE_0015916 DANSKE_0015927 DANSKE_0015917 DANSKE_0015886 DANSKE_0015892 DANSKE_0015885 DANSKE_0015940 DANSKE_0015949 DANSKE_0015905 DANSKE_0015955 DANSKE_0015910 DANSKE_0015925 DANSKE_0015929 DANSKE_0015948 DANSKE_0015951 DANSKE_0015943 DANSKE_0015939 DANSKE_0015911 DANSKE_0015907 DANSKE_0015931 DANSKE_0015901 DANSKE_0015941 DANSKE_0015938 DANSKE_0015890 DANSKE_0015906 DANSKE_0015909 DANSKE_0015884 DANSKE_0015893		

Request No.	Request	Bates No.	Production Date(s)	Objections and Responses
		DANSKE_0015947 DANSKE_0015933 DANSKE_0015924 DANSKE_0015935 DANSKE_0015915 DANSKE_0015896 DANSKE_0015932 DANSKE_0015914 DANSKE_0015950 DANSKE_0015889 DANSKE_0015952 DANSKE_0015922 DANSKE_0015920 DANSKE_0015707 DANSKE_0015953		
55	Produce any and all documentation and correspondence related to a potential or contemplated sale or auction of the DCSL resort by Danske.			Danske objects to this Request as overly broad, unduly burdensome, and irrelevant. Based on its objections Danske will not produce the documents called for in the Request.
56	Produce any and all documentation and correspondence related to Danske's transfers of its, actual or potential, interests in the DCSL resort.			Danske objects to this Request as overly broad, unduly burdensome, disproportionate to the needs of this case, irrelevant, and purportedly seeks documents which are covered by the attorney-client privilege, attorney work product privilege, and/or any other applicable privilege. Based on its objections Danske will not produce the documents called for in the Request.